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FEDERAL COMMUNICATIONS COMMISSION
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FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of)

Amendment of the Commission's)
Rules Concerning Maritime)
Communications)

PR Docket No. 92-257
RM-7956, 8031, 8352

To: The Commission

COMMENTS

Paging Systems, Inc. ("PSI"), by its attorneys and pursuant to Second Report and Order and Second Further Notice of Proposed Rulemaking in Private Radio Docket No. 92-257, RM-7956, 8031, 8352, hereby submits its Comments in the Second Further Notice of Proposed Rulemaking ("NPRM"). The Federal Communications Commission ("FCC" or "the Commission") invited comments on the NPRM to be filed by August 25, 1997.

I.

Statement of Interest

PSI is a Commercial Mobile Radio Service provider offering service to the maritime community over an Automated Maritime Telecommunications System ("AMTS") licenses under Part 80 of the Commission's Rules, on the west coast of the United States from Mexico to Canada and in Hawaii. It has licenses for AMTS facilities on the east coast from Maine to Puerto Rico. It also has pending applications in the Great Lakes area and for many of the inland waterways, excluding the Mississippi River.

PSI supports the Commission's efforts to increase flexibility in the Maritime Service to promote innovative telecommunications services, improve communication capabilities and reduce regulatory burdens.

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PSI will limit its Comments to the Commission's proposals for AMTS only.

II.

Discussion

A. *Siting Flexibility In The AMTS*

In response to the Commission's questions regarding siting flexibility in paragraph 115 of the NPRM, PSI respectfully submits the following;

(a) In response to the percentage of existing AMTS transmitter which have required broadcaster notification, PSI has provided broadcaster notification for approximately 95% of its applications for transmitter sites. None of the transmitter sites which have been placed into service have caused harmful interference to television reception. Therefore, PSI has never had to take steps to remedy interference.

(b) With respect to the Commission's questions regarding AMTS technical criteria for protecting digital television stations, PSI submits that this criteria appears to be out of date even in connection with analog television receivers. As required by the Commission, PSI analyzes its sites utilizing the Eckert Report, Guidance for Evaluating the Potential for Interference to TV Stations from Stations of the Inland Waterway Communications System, FCC/OST TM 82-5 (1982) to determine interference to television susceptibility to interference. The Eckert Report was written in 1982 and accordingly because of the significantly improved television receiver performance, PSI submits that the Eckert Report presently overstates the potential for interference to television receivers. In addition, cable television operators using a master antenna and shielded distribution cable further reduce the possibility of interference from mobile stations. PSI submits that the Commission should reevaluate this outdated criteria and streamline the application process since improved engineering has reduced the potential for interference.

(c) In connection with the Commission question regarding the disadvantages and advantages of developing technical limitations, PSI agrees that greater flexibility should be given to AMTS licensees to allow them to construct fill-in stations and stations at remote locations without notifying the Commission or the broadcasters. PSI also supports a power increase to 50 watts per channel into the antenna. With updated criteria for measurement of potential interference, PSI submits that the only overriding technical requirement should be protection from interference to broadcasters by AMTS operations.

B. *Construction Flexibility In The AMTS*

In connection with construction flexibility, the Commission proposes to amend the Rules to require new AMTS systems to be placed in operation within two years of the date of grant and that subsequent stations would be constructed within one year of grant. In connection with that proposal, PSI responds to the Commission's questions as follows:

(a) Relating to the question regarding differentiation between fill-in stations and stations that extend an AMTS system, PSI submits that the Commission should review the AMTS systems operating and licensed presently to determine if there is a necessity for such differentiation. There are two blocks of frequencies in the AMTS service. These blocks are licensed on both the west and east coasts, with applications pending in the Great Lakes and various inland waterways. PSI questions whether there is a need to designate "new" or "extended" licenses in a spectrum block, with limited frequencies, existing licensees on both spectrum blocks on both coasts and pending applications for both blocks on a majority of the navigable waterways in between. As an alternative position, PSI suggests that the FCC employ its proposed geographic service areas as a basis for determining new or extended licenses. If the application falls outside of the geographic service area served by an existing system, that would be considered a new AMTS service area.

(b) In connection with questions concerning one year construction requirements, PSI supports this construction requirement if a licensee is requesting a single station authorization to extend its AMTS system. However, if the licensee proposes to significantly extend its system by constructing multiple stations, it should be allowed two years to construct. The Commission should not consider such an application to be a new AMTS system as long as it extends an existing system within the same geographic service area.

C. *Technical Flexibility In The AMTS*

PSI supports the Commission's proposal to eliminate the modulation and channelization requirements for AMTS public coast stations, as long as transmissions do not exceed the adjacent channel emission limitations of each station's authorization. PSI further supports the Commission proposal to amend the rules governing the output power measurement of AMTS coast stations, making them consistent with those governing the 156-162 MHz public coast stations. As mentioned above, PSI supports the power increase to 50 watts per channel into the antenna. It also supports the proposal to increase the power on low power radio service ("LPRS") to one watt.

D. *Competitive Bidding Procedures for the Public Coast Station*

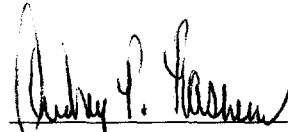
PSI reiterates its questions about the availability of AMTS spectrum in connection with the competitive bidding procedures for AMTS frequencies. As it stated above, with existing licensees on both frequency blocks and pending applications in a majority of the navigable waterways in the United States, PSI asks the Commission to consider the viability of including AMTS spectrum in its proposal for the public coast service spectrum auctions.

WHEREFORE, the above premises considered, PSI requests that the Commission take these Comments into consideration in adopting the final rules in this proceeding.

Respectfully submitted,

PAGING SYSTEMS, INC.

By:



Audrey P. Rasmussen
Its Attorney

O'Connor & Hannan, L.L.P.
1919 Pennsylvania Avenue, N.W.
Suite 800
Washington, D.C. 20006-3483
(202) 887-1431

Dated: September 15, 1997